

1 Anthony P. Schoenberg (State Bar No. 203714)  
tschoenberg@fbm.com  
2 Michelle Kao (State Bar No. 322758)  
mkao@fbm.com  
3 Farella Braun + Martel LLP  
235 Montgomery Street, 17<sup>th</sup> Floor  
4 San Francisco, California 94104  
Telephone: (415) 954-4400  
5 Facsimile: (415) 954-4480

6 Attorneys for Defendants Alphabet Inc. and  
Google LLC

7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION  
9

10 PAUL GARRISON,  
11

12 Plaintiff,

13 vs.

14 ALPHABET INC., GOOGLE LLC, OUTTEN  
& GOLDEN LLP, WAYNE N. OUTTEN,  
15 ANNE GOLDEN, JUSTIN SWARTZ,  
MELISSA WASHINGTON, BRIAN LEE  
16 JOHNSRUD, CURLEY, HURTGEN &  
JOHNSRUD LLP, CIERRA GROSS and  
17 DOES 1-50, inclusive,

18 Defendants.  
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Case No. 3:22-cv-01426-JSC

**STIPULATION FOR EXTENSION OF  
TIME FOR DEFENDANTS TO ANSWER  
OR RESPOND TO AMENDED  
COMPLAINT UNDER L.R. 6-1(a)**

The Hon. Jacqueline Scott Corley

Amended Complaint Filed: March 14, 2022

1 Plaintiff Paul Garrison (“Plaintiff”) and Defendants Alphabet Inc., Google LLC, Outten &  
 2 Golden LLP, Brian Lee Johnsrud, Curley, Hurtgen & Johnsrud LLP, and Cierra Gross  
 3 (“Defendants”)<sup>1</sup>, collectively, “the Parties,” by and through their undersigned counsel, jointly  
 4 submit this stipulation as follows:

5 WHEREAS, on March 14, 2022, Plaintiff filed the operative Amended Complaint in the  
 6 above-captioned matter;

7 WHEREAS Defendants Alphabet Inc., Google LLC, Outten & Golden LLP, and Cierra  
 8 Gross have been served with Summons and the Amended Complaint but their respective deadlines  
 9 to answer or respond to the Amended Complaint have not yet passed;

10 WHEREAS Defendants Wayne N. Outten, Anne Golden, Melissa Washington, Justin  
 11 Swartz, Curley, Hurtgen & Johnsrud LLP and Brian Johnsrud have not yet been served with  
 12 Summons and the Amended Complaint;

13 WHEREAS, the Parties intend to participate in an early mediation to attempt to resolve the  
 14 above-captioned matter;

15 WHEREAS, the Parties agree to defer Defendants’ obligation, if any, to answer or respond  
 16 to the Amended Complaint pending the completion of the mediation;

17 WHEREAS, the Parties agree that if the mediation is completed and does not result in a  
 18 final settlement, the respective times for Defendants to answer or respond to the Amended  
 19 Complaint will be extended until 30 days after the completion of the mediation for Defendants  
 20 who have been served, 60 days after the completion of the mediation for Defendants who are  
 21 waiving service under Federal Rule of Civil Procedure 4, or 30 days after a Defendant is served  
 22 with Summons and the Amended Complaint, whichever is later.

23 WHEREAS, the Parties agree that by attending a mediation and deferring the time for  
 24 responding to the Amended Complaint, Defendants do not waive or otherwise relinquish any  
 25 arguments or defenses that might be asserted in their responses to the Amended Complaint,  
 26 whether by answer or motion, and that all such arguments and defenses are preserved;

27 \_\_\_\_\_  
 28 <sup>1</sup> Wayne N. Outten, Anne Golden, Melissa Washington, and Justin Swartz shall also be considered  
 “Defendants” for purposes of this stipulation.

1 WHEREAS, Defendants Wayne N. Outten, Anne Golden, Melissa Washington, and Justin  
2 Swartz explicitly reserve, and do not waive, their challenges to personal jurisdiction and  
3 insufficient process and nothing associated with this filing or attendance at a mediation or other  
4 proceeding, including any appearance, through counsel or otherwise, shall be deemed a waiver of  
5 these arguments;

6 WHEREAS, the Parties agree that there is good cause supporting the requested extension;

7 WHEREAS, no party to this stipulation has previously requested an extension with respect  
8 to the deadline for filing a responsive pleading to Plaintiff's Amended Complaint in this matter.

9 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendants,  
10 through their respective counsel, and pursuant to Local Rule 6-1(a) of the United States District  
11 Court for the Northern District of California, that (i) the respective times for Defendants to answer  
12 or respond to the Amended Complaint will be extended until 30 days after the completion of the  
13 mediation for Defendants who have been served, 60 days after the completion of the mediation for  
14 Defendants who are waiving service under Federal Rule of Civil Procedure 4, or 30 days after a  
15 Defendant is served with Summons and the Amended Complaint, whichever is later; and (ii)  
16 Defendants do not waive or otherwise relinquish any arguments or defenses that might be asserted  
17 in their responses to the Amended Complaint, whether by answer or motion, and all such  
18 arguments and defenses are hereby preserved.

1 Dated: April 4, 2022

FARELLA BRAUN + MARTEL LLP

2  
3 By: /s/ Anthony P. Schoenberg  
Anthony P. Schoenberg

4 Attorneys for Defendants Alphabet Inc. and  
5 Google LLC

6  
7 Dated: April 4, 2022

8  
9 By: /s/ Laurence S. Moy  
Laurence S. Moy

10 Attorney for Defendants Outten & Golden LLP

11  
12 Dated: April 4, 2022

CURLEY, HURTGEN & JOHNSRUD LLP

13  
14 By: /s/ Katherine C. Huibonhoa  
Katherine C. Huibonhoa

15 Attorneys for Defendants Brian Lee Johnsrud and  
16 Curley, Hurtgen & Johnsrud LLP

17  
18 Dated: April 4, 2022

Springer Ayeni, PLC

19  
20 By: /s/ Cassie Ayeni  
Cassie Ayeni

21 Attorneys for Defendant Cierra Gross

22  
23 Dated: April 4, 2022

Law Offices of Bonner & Bonner

24  
25 By: /S/ Charles A. Bonner  
Charles A. Bonner

26 Attorneys for Plaintiff Paul Garrison  
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**ATTESTATION**

I hereby attest that I have obtained the concurrence of all other signatories in the filing of this document.

Dated: April 4, 2022

FARELLA BRAUN + MARTEL LLP

By: /s/ Anthony P. Schoenberg  
Anthony P. Schoenberg

Attorneys for Defendants Alphabet Inc. and  
Google LLC